

In the United States District Court  
For the Western District of Virginia  
Danville Division

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

JUL 03 2017

BY: JULIA C. DUDLEY, CLERK  
DEPUTY CLERK

Brian David Hill )  
Plaintiff(s) )  
 )  
v. )  
 )  
Executive Office for United States Attorneys )  
(EOUSA) )  
& )  
United States Department of Justice (U.S. DOJ) )  
Defendant(s) )  
 )

Civil Action No. 4:17-cv-00027  
Hon. Judge Jackson L. Kiser

**MOTION ASKING THE COURT TO REQUEST  
LEGAL COUNSEL TO REPRESENT THE PLAINTIFF**

**MOTION AND BRIEF IN SUPPORT OF THIS MOTION**

NOW COMES, the plaintiff ("Brian D. Hill"), representing himself, and hereby respectfully moves the Court to request an Attorney to represent the plaintiff since he was already found to have been in forma pauperis (See Doc. #3). This is pursuant to 28 U.S.C. §1915(e)(1), "The court may request an attorney to represent any person unable to afford counsel." The Plaintiff is filing this Motion a second time with some new evidence, more facts, and modifications from the last Motion to fill the deficiency that had led to the Court denying the Motion filed under Document #13, See ORDER under Document #16.

The plaintiff needs the assistance of Counsel to aid in giving experienced verbal arguments at all trial and hearing proceedings to protect his Constitutional and Federal legal rights, to give Plaintiff fair and impartial access to the adversarial system, to due

process, to not have an unfair disability to which gives the Plaintiff an unfair disadvantage at a trial proceeding, and all other hearings.

In support of this request, Plaintiff establishes the facts and elements in this Motion to state as follows:

### **I. Statutory Framework and Factual Basis**

1. The court denied Plaintiff's Motion filed under Document #13, See ORDER under Document #16. The reason the Court denied such Motion is due to what was outlined in the opinion of the Honorable Judge Jackson L. Kiser. Hon. Judge Kiser stated case law that "*Moreover, requests under Section 1915(e)(1) should generally be granted under exceptional circumstances. See Whisenant v. Yuam, 739 F.3d 160, 163 (4th Cir. 1984), abrogated on other grounds by Mallard, 490 U.S. at 300, n.3. ("[I]t is an abuse of discretion to decline to appoint counsel where the case of an indigent plaintiff presents exceptional circumstances. ").*"
2. The motion is supported by 28 U.S.C. §1915(e)(1), "The court may **request an attorney to represent any person** unable to afford counsel."
3. The Court has already ruled in Document #3 that the Plaintiff is proceeding in forma pauperis, and the motion is making a specific request as under the IFP statute.
4. The plaintiff cannot afford an experienced attorney at law to fight for justice for the plaintiff, to fight for his constitutional and legal rights as per this civil case.

5. All parties in cases have the due process right of the U.S. Constitution as outlined in the fourteenth Amendment. U.S. Constitution; Amendment XIV states that "*Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.*" One party shouldn't be forced into an unfair bench trial, as due process clause and other Constitutional amendments give each person the right to a fair and impartial trial proceeding. If a statute (citing *in forma pauperis* statute as supported by 28 U.S.C. §1915(e)(1)) gives a party a right to file a motion to request a lawyer for a good reason, the Court should entertain such Motion and grant such motion when exceptional circumstances arise from evidence and the Brief contained in such motion.
6. The plaintiff has Autism and Type 1 diabetes as exhibited in Document #2-1, and is considered legally handicapped/disabled under the Virginia Department of Motor Vehicles. It has stated that a licensed physician has certified that the plaintiff is permanently limited or impaired since 2016, which "has been diagnosed with a mental or developmental amentia or delay that impairs judgment including, but not limited to, an autism spectrum disorder." Not just that but Carilion Clinic has been seeing plaintiff for his Type 1 diabetes, which

can be considered brittle enough to require him to see an endocrinologist at Roanoke, VA. Not just the DMV record for a handicapped placard but also the letter from Dr. Balakrishnan which is supported by Exhibit 1.

7. The exceptional circumstances lie in the Plaintiff's Autism Spectrum Disorder, the Autism diagnostic evaluation (as supported by Exhibit 2), the Exhibit 1 letter from Dr. Balakrishnan, and the white paper by expert Dennis Debbaudt ("Mr. Debbaudt"). The Plaintiff is also willing to subpoena Mr. Debbaudt (Attachment 2) to file an independent expert opinion and/or brief in support of Plaintiff's motion if the Court so requires. Mr. Debbaudt explained that those under the Autism Spectrum can give false confessions to law enforcement (when under stress and anxiety) and behave in a way that may be falsely construed as guilt, falsely construed as disrespect, falsely construed as waiving a right, falsely construed as consenting to an argument, or give a gesture that can be misconstrued by a person in authority. The Plaintiff has not ever practiced in any hearing before this Court in the Western District of Virginia. The Plaintiff was normally represented by Counsel in the Middle District of North Carolina for his criminal case, (see Docket # 1:13-cr-435-1, U.S. District Court for the Middle District of North Carolina) and has also appealed the decision of Judge Osteen therefore moving the case to Appeal so it is on the record of the Fourth Circuit Court of Appeals that Plaintiff was appointed the assistance of Counsel. The Plaintiff had filed Pro Se motions when he was appointed Counsel in the criminal case proceedings, but was nevertheless still appointed Counsel. The

Plaintiff can file and exercise professional looking pro-se motions, briefs, and other relevant documentation including filing of subpoenas and writing letters requesting discovery, however the Hon. Judge Kiser failed to understand that Plaintiff has verbal deficiencies and those deficiencies make it difficult for the Plaintiff to argue law correctly at hearings and trial proceedings. The Plaintiff will be arguing against a highly trained, highly paid, and skilled lawyer working for the United States Government. Plaintiff has no experience in a trial proceeding and has no experienced in civil court. The Plaintiff couldn't even defend himself properly in his criminal case because of his Autism and Obsessive Compulsive Disorder, and was thus wrongfully convicted. The Plaintiff has no experience and does not know what to do in an actual physical trial proceeding. Plaintiff has no access to a law library nor to his family to research case law while in a courtroom. When the Plaintiff had filed professional-looking pro se motions, the Plaintiff was residing within the comforts of his home, no crowds of people, and no stress and anxiety which would normally reside in a courtroom type of environment. The Plaintiff has Autism, and although Autism makes a brilliant pro se filer, it does however limit the Plaintiff's ability to conduct the same form of professionalism at an actual hearing in a physical Courtroom. The standards will be different in a physical Courtroom versus filing pro se motions at the U.S. Post Office after drafting such motions at the comfort of home. The Plaintiff has the strength of learning legal knowledge and making the appropriate responses, however will not be able

to exercise the same verbal conduct at any hearing. The Plaintiff has weaknesses which will be noticeable when the Plaintiff is required to face a Trial to fight for his case and present the appropriate evidence and exhibit the appropriate objections. The professional-looking Pro Se filings were all typed up, drafted, and printed in the comfort of Plaintiff's home. Even deadlines does not exhibit the stress and anxiety that would normally happen at a trial proceeding. The Plaintiff can access a law library and can ask for the assistance of family to research by them accessing legal resources online to look up cases for him and aid the Plaintiff in acquiring the case law and statutory law research to aid in the Plaintiff's Motions. Plaintiff also has friends that can help lookup case law and help draft up motions such as for example Eric Clark ("Mr. Clark") of Kansas, but Mr. Clark cannot represent Plaintiff in a physical court proceeding. However the Plaintiff cannot properly argue law at any trial proceeding or hearing, the Plaintiff has Autism and the signs of Autism will indeed show when put under pressure during the stress and anxiety of a trial proceeding, and the same for any other physical hearing. The "exceptional circumstances" that the Plaintiff is required to prove to the Court is in both Mr. Debbaudt's white paper (See Document #12-4, which was filed under Declaration in Document #12), Dr. Balakrishnan's letter, and the Autism diagnostic evaluation as referred by TEACCH. Of course Mr. Debbaudt's white paper focuses mainly on criminal interrogations/interviews, it does however highlight the issues of Autism which can conflict with the normal legal and behavioral procedures to which the Court

expects the proper conduct and attitude of both parties. Mr. Debbaudt states in his whitepaper that “*They may provide no eye contact at all, even when a questioner shifts their position to obtain it. The person may have been taught to give eye contact but this may be perceived as insincere, glaring, or fixated. The interviewer may mistake this unusual eye contact as a tension relieving technique used by a guilty person, when it is nothing more than a symptom of the condition of autism.*” The Plaintiff may give the wrong body language, the wrong argument, or say something in a way that may be construed as inappropriate or contemptuous before the Court. The Plaintiff’s Autism is obvious. If the Court would like to confirm this any further, then the Plaintiff asks the Court to appoint an expert witness psychologist to determine whether Plaintiff needs the assistance of Counsel due to Autism Spectrum Disorder and Type 1 Brittle Diabetes. **In other words the Plaintiff asks to have a mental evaluation to be ordered by the Court, that the Plaintiff’s mental condition needs to be evaluated by an expert to determine whether Plaintiff needs the assistance of Counsel for all hearings before this Court.** Mr. Debbaudt also said in another paragraph that “*They may possess apparently normal verbal skills but be deficient in comprehension, social awareness, and decision-making. They may appear as quite normal at first, but the symptoms, behaviours, and characteristics - for example, providing blunt or tactless answers, changing the subject, or being unable to understand or accept a rational answer - will become apparent to the educated investigator. However, without an*

*understanding of the disability it will be easy to misinterpret the information provided as an indicator of guilt.”* Now again, a civil trial is not a criminal interrogation however the proceedings are similar in the causes of stress, anxiety, and change of environment which will make Plaintiff’s Autistic behavior more apparent and noticeable in that of a court trial or court hearing. With the assistance of Counsel, the Plaintiff can give the evidence and planned arguments to the Legal Counsel which can address in the issue of deficiency of Plaintiff’s verbal arguments and appropriate behavior at the Trial and any other appropriate hearings. The Court will take into account in this civil case the behavior of the Plaintiff, the attitude of the Plaintiff, the body language of the Plaintiff, the expectation of the Plaintiff to make the appropriate and quick responses, the expectation of the Plaintiff to answer the Defendants’ questions or objections, and all of these different issues come into conflict with Plaintiff’s Autism and Type 1 Brittle Diabetes. It may appear that the Plaintiff could be considered defiant or in contempt of court when in reality his diabetic blood sugar could be low, and may exhibit behaviors that the Court may misconstrue it as to consider it an on-purpose behavioral issue instead of addressing that issue as being an issue of Autism Spectrum Disorder, Type 1 Diabetes, and Obsessive Compulsive Disorder. If the Court does not consider Mr. Debbaudt’s whitepaper to be sufficient as demonstrating a need for the Court to request Counsel to represent the Plaintiff for the purposes of a trial proceeding and status conference type proceedings, then the **Plaintiff agrees**

**that the Court should order a mental evaluation to determine whether Plaintiff can argue at a trial proceeding without a lawyer or as to whether Autism Spectrum Disorder can interfere with the due process of both parties.**

8. Dr. Shyam Balakrishnan has certified in a letter, attached in **Exhibit 1**, that (referring to Plaintiff) "*He has a diagnosis of diabetes, seizures, autism and obsessive compulsive disorder. One or more of these condition can limit his ability to be in social situation or among people and do work.*" A trial proceeding will be in a public place, have a lot of people, and will place the Plaintiff under a significant amount of stress and anxiety which can negatively affect his performance of presenting a case at trial and any other hearings/proceedings, **which violates his equal access in the adversarial system which both parties have to present their side of the case under.** Arguments must be argued by both parties of the case, and **Plaintiff's Autism severely limits his ability to present his case under a fair and impartial adversarial system as guaranteed by Due Process and other clauses of the U.S. Constitution.** Plaintiff needs a lawyer to be a buffer between him and the Court, a buffer between him and the Government, and argue the Plaintiff's case.

9. The U.S. Attorney Cheryl T. Sloan is an experienced Attorney and has better knowledge than the pro se Plaintiff. The Defendants' lawyer does not have Autism, does not have Type 1 diabetes, and does not have Obsessive Compulsive Disorder. The Plaintiff does in fact have those disorders and

Diabetes. This gives the Defendants' an unfair advantage against the Plaintiff in the adversarial system that should be fair, balanced, and impartial. Since statute gives the Plaintiff a right to request a lawyer, the Court should entertain that motion and attempt to request that a lawyer represent the Plaintiff so that Plaintiff has a fair and just outcome in the adversarial system during the Trial and any pretrial hearings, and give the Plaintiff an equal access to justice during the entire proceedings of this case.

10. **Because of these health issues, it will be difficult for the Plaintiff to present a case himself at trial without assistance, and it will be difficult to argue the case correctly while at trial without somebody to assist him. Due to disability health reasons and IFP status, the plaintiff asks the Court to please grant this motion as soon as possible. The plaintiff asks the Court to find an attorney to request representation of the plaintiff to aid in his case for the interests of justice and fighting for plaintiff's due process rights.**
11. Under Hon. Judge Kiser's order under Document #16, it stated that "*Despite these self-described limitations, Plaintiff has already filed multiple motions and demonstrated a command of civil procedure beyond that of an average plaintiff appearing pro se.*" Again at the time of this order and before this order, Plaintiff never personally appeared at any hearing in front of Judge Kiser or any Judge in this Court for the Western District of Virginia. The Judge has no knowledge of Plaintiff's behavior and verbal weaknesses. The Plaintiff appears to follow the command of civil procedure in writing, but the Court has no knowledge of what

behavior the Plaintiff may exhibit in an actual hearing or trial proceeding. The Court only has limited knowledge of Plaintiff's mental and physical health issues, aka the health conditions, and should not be quick to judge that the Plaintiff can act appropriately and professionally in an actual physical Court hearing in a physical building. First of all a court trial is within a chamber environment and not within Plaintiff's home. The Plaintiff types all of his pro se motions at home, in the comfort and safety and privacy of his home. The Plaintiff will have no such environment at a trial proceeding. The Plaintiff will be expected to follow appropriate verbal conduct that may not be exhibited the way the Court expects of it when compelling the Plaintiff to say things or to argue things in such a way that the Court would find appropriate and acceptable.

**In our Constitution, the right to the assistance of Counsel is apart of due process. The Legal Counsel can be used as a buffer between the party and the court and between the party and the Government. Legal Counsel can be used to prevent the Plaintiff from accidentally giving the wrong indication of waiving his Constitutional rights or incorrectly arguing at a trial proceeding.**

12. Two new expert-witnesses are requested to the Court (Attachment 1 and Attachment 2), to be subpoenaed as requested in this Motion, to write their expert opinions to the Court, to the Plaintiff, and to the Defendants' Attorney as to expert witness opinion which supports why this Motion should be granted, as to why the Plaintiff needs the assistance of Counsel due to his **Autism**

**Spectrum Disorder which gives him an unfair disadvantage in the judicial system including the due process clause and the adversarial system guaranteed to all parties of each case.**

Attachments to this MOTION in support of MOTION and BRIEF:

- **Attachment 1:** Proposed Subpoena for Preston Page the mental health Counselor of Plaintiff Brian D. Hill, to produce a written letter to the Court, to Defendants' Attorney, and to Plaintiff Brian D. Hill on his expert opinion as to why Plaintiff needs the assistance of Legal Counsel to meet the exceptional circumstances to require the Court to request the assistance of Counsel to represent the Plaintiff.
- **Attachment 2:** Proposed Subpoena for Dennis Debbaudt, to produce a written letter to the Court, to Defendants' Attorney, and to Plaintiff Brian D. Hill on his expert opinion as to why Plaintiff needs the assistance of Legal Counsel to meet the exceptional circumstances to require the Court to request the assistance of Counsel to represent the Plaintiff.
- All Exhibits below are declared under Oath and are listed in the Declaration attached to this MOTION. Exhibits 1 and 2 will both provide evidence to the Court on Plaintiff's disability and how it relates to and can affect the outcome of the proceedings in this case.

The plaintiff cannot afford an experienced attorney at law to fight for justice for the plaintiff, to fight for his constitutional and legal rights as per this civil case. The Plaintiff is in forma pauperis, the Plaintiff has mental and physical disabilities which gives him an unfair advantage and negatively effects his ability to present his case properly at the Trial proceeding and other hearings/proceedings, and the Plaintiff is not experienced in arguing law.

**The plaintiff hereby requests a second time, with filling the deficiency as the Judge mentioned in his Order (See Doc. #16). The Plaintiff does exhibit exceptional circumstances as to why the Plaintiff should ask the Court to request the assistance of Counsel to represent the Plaintiff. The Plaintiff asks this Court to grant this MOTION. The Hon. Judge Kiser should reconsider his stance on this. Thanks!**

Plaintiff also requests with the Court that copies of this Motion and Brief be served upon the Government as stated in 28 U.S.C. §1915(d), that "The officers of the court shall issue and serve all process, and perform all duties in such cases. Witnesses shall attend as in other cases, and the same remedies shall be available as are provided for by law in other cases.  
Plaintiff requests that copies be served with the defendants' and the U.S. Attorney office of Roanoke, VA and AUSA Cheryl T. Sloan via CM/ECF Notice of Electronic Filing ("NEF") email, by facsimile if the Government consents, or upon U.S. Mail. Thank You!

This MOTION and Brief is respectfully filed with the Court, this the 1<sup>st</sup> day of July, 2017

Date of signing:

July 1, 2017

Respectfully submitted,

Brian D. Hill  
Signed

Brian D. Hill (Pro Se)  
310 Forest Street, Apartment 2  
Martinsville, VA 24112  
Phone #: (276) 790-3505

**U.S.W.G.O.**

**Declaration of Plaintiff Brian David Hill in support of MOTION TO  
EXPEDITE THE TRIAL PROCEEDINGS**

I, Brian David Hill, declare pursuant to Title 28 U.S.C. § 1746 and subject to the penalties of perjury, that the following is true and correct:

1. I am Brian David Hill, also known as Brian D. Hill, and am the Plaintiff in the Federal civil case Brian David Hill v. Executive Office for United States Attorneys et al., Civil Case No. 4:17-cv-00027. I file this Declaration type of Affidavit with the Court with original signature as a sign of good faith and demonstrating factual evidence showing good cause for such action. I was the criminal defendant of case named United States of America v. Brian David Hill, Case # 1:13-cr-435-1, and in the U.S. District Court for the Middle District of North Carolina. I am INNOCENT, and am trying to prove my innocence but am being blocked and my due process was deprived forcing me into taking the guilty plea agreement under false pretenses, being misled by the Federal Public Defender office in Greensboro, North Carolina. I have Autism Spectrum Disorder (ASD), Obsessive Compulsive Disorder (OCD), Generalized Anxiety Disorder (GAD), and I have type 1 brittle diabetes (diabetes mellitus). Because of that I am good at performing visual legal work but my verbal legal work is severely limited by my Autism. So I need around the clock medical care by a medical caretaker. My health is brittle and I need the Court to consider this fact and review the medical

**records that I submit to the Court, that I have in my possession and medical records in every medical facility that has ever dealt with my health problems.**

- 2. I have Autism Spectrum Disorder (“ASD”), Obsessive Compulsive Disorder (“OCD”), Type 1 Brittle Diabetes, and Generalized Anxiety Disorder. I can do good when I draft a motion and do research at a law library or even have my family conduct research on laws and cases or gather evidence for me, to which allowed me to proceed with filing Pro Se motions and filings with this Court. I have difficulty in verbal argument and have a difficult ability to be able to socialize with other people appropriately. When I am put under any form of stress and/or pressure then my symptoms of Autism and OCD start to show, especially of being in an environment such as a Courtroom or interrogation room. I will not be able to guarantee looking the Judge straight in the eyes due to my Autism. I cannot retain the legal knowledge to such extent needed where I can properly cite case law and make the appropriate arguments in a court hearing. That is the reason I had originally filed a motion requesting that the court request Counsel to represent me, since a person with Autism is not capable of making the appropriate and valid arguments under the adversarial system. The lawyer is needed for the actual trial and pretrial hearings/proceedings. Yes I can file professional looking motions to which seem to have impressed Judge Kiser, however Judge Kiser has never seen me attempt any argument in an actual courtroom. If he did witness me**

**arguing in the courtroom and not giving the appropriate body language and gestures that a normal skilled lawyer would be able to exhibit before this Court, then any reasonable Judge would consider my Autism as a critical issue that can be misinterpreted as contempt, mocking, or disrespect. With a lawyer to represent me during the trial proceeding and other hearings for this case, the lawyer can make the appropriate verbal arguments.**

- 3. I was diagnosed with insulin dependent diabetes with seizures and PDD by the time that I was 2 years old and with autism when I was age 4. I have always done well with visual (writing and reading materials that I take an interest in, including typing on a computer, word processing program) but my main issues of my disability that this Court should take notice of is in the verbal, social areas. Autism is a developmental disorder that results in impaired social behavior, difficulty communicating to others, and repetitive behavior patterns. Medical experts diagnose autism by performing neurological, cognitive, and language testing. Due to my autism and brittle diabetes with seizures, I have been on SSI before the age of 2 years old (for over 25 years) and will be disabled for life. I also have a disability Medicaid waiver (ADW) in Virginia since 2012 which pays for a caregiver and aids so I can remain in my own home. I have at least 4 disabilities which are covered (insulin dependent diabetes, seizures, autism and OCD) under the Americans with Disabilities act I would need an advocate (a**

**records that I submit to the Court, that I have in my possession and medical records in every medical facility that has ever dealt with my health problems.**

- 2. I have Autism Spectrum Disorder (“ASD”), Obsessive Compulsive Disorder (“OCD”), Type 1 Brittle Diabetes, and Generalized Anxiety Disorder. I can do good when I draft a motion and do research at a law library or even have my family conduct research on laws and cases or gather evidence for me, to which allowed me to proceed with filing Pro Se motions and filings with this Court. I have difficulty in verbal argument and have a difficult ability to be able to socialize with other people appropriately. When I am put under any form of stress and/or pressure then my symptoms of Autism and OCD start to show, especially of being in an environment such as a Courtroom or interrogation room. I will not be able to guarantee looking the Judge straight in the eyes due to my Autism. I cannot retain the legal knowledge to such extent needed where I can properly cite case law and make the appropriate arguments in a court hearing. That is the reason I had originally filed a motion requesting that the court request Counsel to represent me, since a person with Autism is not capable of making the appropriate and valid arguments under the adversarial system. The lawyer is needed for the actual trial and pretrial hearings/proceedings. Yes I can file professional looking motions to which seem to have impressed Judge Kiser, however Judge Kiser has never seen me attempt any argument in an actual courtroom. If he did witness me**

lawyer) in the courtroom during the trial days) due to all of my disabilities.

4. I have attempted to ask for a lawyer to help me on a Pro Bono basis such as The Rutherford Institute, and even asked experienced FOIA lawyer Scott A. Hodes to help me at a Pro Bono or cheap rate, or request the Court for Attorney fees upon being the prevailing party. Both Rutherford Institute and Scott Hodes have refused to represent me for this FOIA lawsuit. I have tried the Legal Aid Society, and other possible places, and nobody wanted to help me, not one lawyer. Part of the reason that may be is due to the subject-matter and stigmatization of my wrongful conviction. I was wrongfully convicted of possession of child pornography (“child porn”) and wrongfully serving a sentence. I am wrongfully a registered sex offender as I am a virgin, was set up with child porn, and am of no danger to any children in society. However when lawyers hear the words “child porn” they assume that I am guilty or they feel iffy about using up any legal resources on a charity case that involves “child porn” or “child sexual abuse images”. It doesn’t matter that I want to prove my innocence. Lawyers are extremely iffy about helping a “suspected child pornographer” proving innocence. That is why I feel better filing the Motion asking for a lawyer since lawyers would respect a Court requesting Counsel rather than a run-of-the-mill child-pornography-suspect or convict trying to prove actual innocence. The Court would have better success at asking a lawyer to represent me than me explain my situation

**to them, to which my Autism works against me and makes it difficult to convince a lawyer to take my case at an extremely cheap rate or on a Pro Bono basis when accused of possessing child sexual abuse images when trying to prove actual innocence. The stigma of my wrongful charge/conviction is being used against me when looking for a lawyer.**

- 5. Attached hereto as Exhibit 1, is a true and correct copy of the May 16, 2017 Doctors letter from Carilion Clinic in Martinsville, VA, located at 1107a Brookdale Street, Martinsville, VA 24112. The doctor whom had typed this certification letter was Dr. Shyam E. Balakrishnan, MD. This letter shall serve as proof of Plaintiff's disability for this case. This letter is 1-Page.**
- 6. Attached hereto as Exhibit 2, is a true and correct copy of the 6-Page diagnostic evaluation by the Department of Psychiatry of the University of North Carolina, the Division for Treatment and Education of Autistic and Related Communication Handicapped Children. Report is dated October 19, 1994. It was signed for and supported by experts such as Allison Butwinski (Parent Consultant), Roger D. Cox, Ph.D. (Licensed Practicing Psychologist), and Marquita Fair (Child Therapist).**
- 7. I will submit more evidence to the Court as needed if necessary for granting of my Motion requesting Legal Counsel. If Counselor Preston Page writes any letter to me which does not appear on Docket then I shall file as new evidence when the time is appropriate.**

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 1, 2017.

Brian D. Hill

Signed

Signed

Brian David Hill(Pro Se)

Former news reporter & Founder of USWGO Alternative News  
Home Phone #: (276) 790-3505  
310 Forest Street, Apt. 2. Martinsville, VA 24112

**U.S.W.G.O.**